

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATIONWIDE RECOVERY, INC.,
a Michigan corporation,

Plaintiff/Counter-Defendant,

vs.

Case No. 2:17-cv-12378

Hon. Linda V. Parker

Mag. Jdg. Stephanie Dawkins Davis

CITY OF DETROIT,

Defendant/Counter-Plaintiff,

CITY OF DETROIT,

Third-Party Plaintiff,

vs.

JERRY PARKER, an individual, et al

Third-Party Defendants.

**DEFENDANT CITY OF DETROIT'S (1) RESPONSE TO PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY JUDGMENT AND (2) CROSS-
MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO PLAINTIFF'S
DUE PROCESS CLAIM**

City of Detroit, pursuant to Fed. R. Civ. Pro. 56, and for the reasons stated in the accompanying brief, asks the Court to (1) deny plaintiff's motion for partial summary judgment as to Count I of its complaint (due process), and (2) grant the

City cross-motion seeking summary judgment dismissing Count I of plaintiff's complaint.

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